

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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FRIENDS OF GEORGE’S, INC.,	)	
	)	<b>Case No. 2:23-cv-02176-TLP-tmp</b>
PLAINTIFF,	)	
	)	
	)	
	)	<b>COMPLAINT FOR VIOLATIONS OF</b>
	)	<b>THE CIVIL RIGHTS ACT OF 1871, 42</b>
v.	)	<b>U.S.C. § 1983</b>
	)	
	)	
	)	
STEVEN J. MULROY, <i>in his official and</i>	)	
<i>individual capacity as District Attorney</i>	)	
<i>General of Shelby County, Tennessee,</i>	)	
	)	
	)	
DEFENDANTS	)	

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**DECLARATION OF VANESSA RODLEY**

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Vanessa Rodley, under penalty of perjury, declares as follows:

1. I am over the age of eighteen (18) and am the President and Festival Director of Mid-South Pride Foundation, Inc.
2. Mid-South Pride Foundation, Inc. (“Mid-South Pride”) is a registered 501(c)3 non-profit that organizes and hosts an annual pride festival in Memphis, Tennessee.
3. Since the amendments to T.C.A. § 7-51-1407 were signed into law by Governor Bill Lee on February 27, 2023, Mid-South Pride has seen a noticeable decline in sponsorship for its 2023 festival.

4. Last year, Mid-South Pride had a total of 43 sponsors for its 2022 festival.
5. As of March 30, 2023, Mid-South Pride has only 23 sponsors for its 2023 festival.
6. Usually, 60 days out from their annual event, Mid-South Pride has secured 90% of its annual budget from sponsors.
7. This year, 63 days out from their annual event, Mid-South Pride has only 60% of its annual budget from sponsors.

**I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.**

Dated this 30th day of March, 2023

/s/ Vanessa Rodley

Vanessa Rodley